

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

**CERTIFICATION OF DANIEL NIGH IN SUPPORT OF PLAINTIFFS’  
RESPONSE TO TORRENT-SPECIFIC MOTIONS *IN LIMINE***

1. I am an attorney at law within the State of Florida, and a partner with the law firm of NIGH GOLDENBERG RASO, & VAUGHN, PLLC, and serve as Plaintiffs’ Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs’ motion for partial summary judgment.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the June 6, 2021 deposition of Sushil Jaiswal.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the June 4, 2021 deposition of Sushil Jaiswal.
4. Attached hereto as **Exhibit 3** is a true and correct copy of TORRENT-MDL2875-00208351.
5. Attached hereto as **Exhibit 4** is a true and correct copy of TORRENT-MDL2874-00005763.
6. Attached hereto as **Exhibit 5** is a true and correct copy of the deposition of Dawn Chitty.
7. Attached hereto as **Exhibit 6** is a true and correct copy of TORRENT-MDL28750090454.

8. Attached hereto as **Exhibit 7** is a true and correct copy of TORRENT-MDL2975-00436416.
9. Attached hereto as **Exhibit 8** is a true and correct copy of the deposition of Dhrumit Shah.
10. Attached hereto as **Exhibit 9** is a true and correct copy of TORRENT-MDL2875099995188.
11. Attached hereto as **Exhibit 10** is a true and correct copy of TORRENT-MDL2875-00124209.
12. Attached hereto as **Exhibit 11** is a true and correct copy of the deposition of Philip Russ.

**NIGH, GOLDENBERG, RASO, & VAUGHN**  
Attorneys for Plaintiffs

By: /s/ Daniel Nigh

Dated: February 26, 2024